

December 30, 2002

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DOCKET NUMBER
PETITION FILE PRM 50-79
(67FR 66588)

U. S. N. R. C.
Rulemakings and Adjudications Staff
Washington, D. C. 20555-0001

DOCKETED
USNRC (23)
2003 JAN 15 AM 11:26
OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Subject: PROPOSED RULE CHANGE FOR 10 CFR Part 50 [Docket No. PRM-50-79]

Dear Sirs:

Enclosed for your consideration are my comments on the subject rule change as
published in the Federal Register Vol. 67/ No. 212 / Friday, November 1, 2002.

Sincerely,

Wm C Thomison

Enclosure

Template=SECY-067

SECY-02

(Docket No. PRM-50-79)

I agree that there may be a problem with the emergency preparedness at day-care centers and nursery schools. The problem is much larger than what is covered in this petition, which concerns only the health and safety of those close to nuclear facilities. What about those other day-care centers and nursery schools not covered by the petition? They should be regulated also. Therefore, I do not think that the Nuclear Regulatory Commission is the proper agency to correct the real issue, which is the emergency preparedness of all day-care centers and nursery schools.

There is a far greater probability of a chemical or biological release necessitating an emergency evacuation than one caused by a nuclear facility. How many day-care and nursery schools are located near major highways, airports, navigable rivers, railroads, refineries or chemical plants? All of these are potential sources for the release of very hazardous/toxic chemicals. Some of these chemicals could result in immediate death to those unfortunate enough to be in the path of the plume. One has only to consider the number of railroad derailments and highway accidents that occur each year versus the number of nuclear accidents to see that the threat is not confined to just the nuclear industry.

The practitioners seem to be too prescriptive in their requirements for an emergency plan. If an evacuation of a day care center were needed to avoid a cloud of chlorine gas released from an over-turned rail car, I would not care who drove my child away from the facility of even if they were properly fastened in place. Each facility should be required to have a workable evacuation plan that allows for the rapid removal of the children from danger to a predetermined location(s). These plans should be given to parents when the children are enrolled. The details of how the plans are implemented should be left to the individual facilities.

It is a good practice to have a stockpile Potassium Iodide (KI) located near nuclear facilities. However, it should be maintained and administered by health care professionals especially when we are dealing with infants and young children. KI is only beneficial when a release contains a significant amount of radioactive iodine. This information may or may not be known at the time an evacuation is ordered. The unnecessary ingestion of KI could cause adverse side an effect, especially if too much is administered.

A more practical approach would be to have evacuees report to a predetermined location(s) to 1) to see if Iodine was actually released 2) to determine if the individual was actually exposed and 3) if required, to insure someone administers it that knows and can prescribe the correct dosage to each individual. Additionally, a centralized stockpile of KI helps ensure it can be found when it is needed and that any self-life issues are addressed.

While I am concerned for anyone that might accidentally get exposed to a release of radiation, I am more fearful for those that might get exposed to a toxic chemical release. Exposure to excessive radiation may result an increased risk for cancer later in their life. Exposure to some of the chemicals commercially produced and routinely transported in this country could cause immediate death.

If the petitioners are truly concerned about the health and safety of children and infants as they claim, they should revise their petition to cover all licensed facilities housing infants and small children. They should then direct their petition to their State agency that grants licenses to these facilities. This agency has the authority to regulate and enforce policies for the entire industry. This way all day-care and nursery schools would be ready in the event there was a need for an immediate evacuation and not just those within 10 miles of a nuclear facility. Failure to comply could result in the loss of their license!